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Proposed Attorneys for Chapter 11 Debtor
and Debtor in Possession

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA

(LOS ANGELES DIVISION)

In re)	Case No. 2:13-bk-21466-NB
)	
KREISS ENTERPRISES, INC.,)	
)	CHAPTER 11
Debtor.)	
)	
)	
)	
)	STIPULATION TO CONTINUE
)	HEARING ON NOTICES OF INSIDER
)	COMPENSATION FOR THOMAS J.
)	KREISS AND LOREN KREISS
)	
)	
)	<u>Current Hearing Date:</u>
)	Date: June 11, 2013
)	Time: 11:00 a.m.
)	Place: Courtroom 5B
)	411 West Fourth Street
)	Santa Ana, CA
)	
)	
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)	

1 Kreiss Enterprises, Inc., the debtor and debtor in possession in the above-captioned
2 bankruptcy case (the "Debtor") on the one hand and Electronic Cash Systems, a division of US
3 Alliance Group and CardFlex, Inc. (collectively, "CardFlex" and together with Debtor, the
4 "Parties") on the other hand, by and through their counsel, hereby enter into this stipulation to
5 continue the hearing on the Notices of Insider Compensation for Thomas J. Kreiss and Loren Kreiss
6 (the "Notices of Insider Comp") as follows:

7 1. On April 30, 2013 (the "Petition Date"), the Debtor filed a voluntary petition for
8 relief under chapter 11 of the Bankruptcy Code.

9 2. On May 1, 2013, the Debtor served on the United States Trustee and certain
10 creditors Notices of Insider Comp.

11 3. On May 14, 2013, CardFlex filed its objection to the Notices of Insider Comp (the
12 "Objection"). No other objection(s) to the Notices of Insider Comp were filed.

13 4. The Notices of Insider Comp, and CardFlex's Objection thereto, are set for hearing
14 on June 11, 2013 at 9:00 a.m. (the "Hearing").

15 5. After the filing of the Objection, the Parties entered into settlement discussions,
16 which resulted in a settlement regarding the Notices of Insider Comp and the Objection. The Parties
17 are in the process of documenting the settlement and obtaining Court approval of the settlement, and,
18 therefore, the parties believe that it is in their best interests, and will avoid imposition upon judicial
19 resources, to continue the Hearing to allow the parties to document and obtain Court approval of
20 the settlement.

21 NOW, THEREFORE, IT IS HEREBY STIPULATED, subject to approval of the Bankruptcy
22 Court, that the Hearing shall be continued to a date and time convenient for the Court that is
23 approximately three (3) weeks from June 11, 2013.

24 *[Signatures on following page]*
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1 Dated: May 30, 2013

LEVENE, NEALE, BENDER, YOO
& BRILL, L.L.P.

2
3 By: 

4 MARTIN J. BRILL

JULIET Y. OH

5 LINDSEY L. SMITH

6 Proposed Attorneys for debtor and debtor in
possession

7 Dated: June 3, 2013

RUTAN & TUCKER, LLP

8
9 By: 

10 ERIC J. FROMME

Attorneys for Creditor

11 Electronic Cash Systems, a division of
12 US Alliance Group, and CardFlex Inc.
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 10250 Constellation Boulevard, Suite 1700, Los Angeles, CA 90017.

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION TO CONTINUE HEARING ON NOTICES OF INSIDER COMPENSATION FOR THOMAS J. KREISS AND LOREN KREISS**; will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **June 4, 2013**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Joseph M Adams on behalf of Interested Party Courtesy NEF
jadams@lawjma.com

Martin J Brill on behalf of Debtor Kreiss Enterprises, Inc.
mjb@lnbrb.com

Eric J Fromme on behalf of Creditor Electronic Cash Systems
efromme@rutan.com

Eric J Fromme on behalf of Interested Party Rutan & Tucker, LLP
efromme@rutan.com

Ed J Gezel on behalf of Creditor Daimler Trust
Notices@bkservicing.com

Paul T Johnson on behalf of Interested Party Camino Santa Fe Investment, LLC
ptj@paultjohnson.com, admin@ptjlaw.com;desiree@ptjlaw.com

Mary D Lane on behalf of Interested Party Courtesy NEF
mal@msk.com, mec@msk.com

Dare Law on behalf of U.S. Trustee United States Trustee (LA)
dare.law@usdoj.gov

Susan I Montgomery on behalf of Creditor AJA Rugs, Inc.
susan@simontgomerylaw.com

Juliet Y Oh on behalf of Debtor Kreiss Enterprises, Inc.
jyo@lnbrb.com, jyo@lnbrb.com

Ernie Zachary Park on behalf of Creditor The Irvine Company
ernie.park@bewleylaw.com

Kristen N Pate on behalf of Creditor GGP Limited Partnership
ggpbk@ggp.com

Tina M Pivonka on behalf of Creditor Torrey Pines Property Management, Inc.
tpivonka@mulvaneybarry.com, ihector@mulvaneybarry.com

Lindsey L Smith on behalf of Debtor Kreiss Enterprises, Inc.

lls@lnbyb.com

United States Trustee (LA)
ustpreion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On June 4, 2013, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

VIA U.S MAIL

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on June 4, 2013, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA ATTORNEY SERVICE

The Hon. Neil W. Bason
United States Bankruptcy Court
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1552 / Courtroom 1545
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 4, 2013
Date

Marla L. Fuentes
Printed Name

/s/ Marla L. Fuentes
Signature